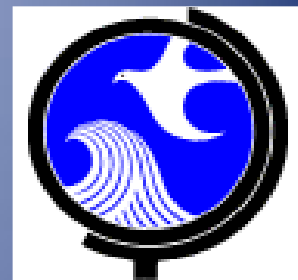




New Jersey Department of Environmental Protection



Capacity Assurance Program

NJPDES

Treatment Works Approval Program

N.J.A.C. 7:14A-22 and 23

October 2014

Existing Capacity Assurance Program

N.J.A.C. 7:14A-22.16

- CAP is infrastructure and permit limit driven: designed to ensure permit limits are met and tied to sewer bans
- Whenever the “committed flow” reaches or exceeds 80% percent of the permitted capacity of a treatment works, the participating municipalities and/or sewerage authorities shall submit to the Department a program to be implemented in order to prevent an overloading of their facility or a violation of their NJPDES permit.
- “Committed Flow” = actual flow (3 most recent consecutive month average flow) + the sum of all flows anticipated from approved, but not yet operational connections to the plan , as defined at NJAC 7:14A-1.2.

Existing Capacity Assurance Program Requirements N.J.A.C. 7:14A-22.16

- The Program shall include:
 1. Water conservation measures
 2. Infiltration/Inflow reduction
 3. Maximize flow to WWTP
 4. Construction Improvements
 5. Disconnect roof leaders, sump pump for inflow reduction
 6. Quarterly Reports (WQM007)
 7. Self Imposed Sewer Connection Ban, if you expect to violate the NJPDES permit

Program Analysis

- Existing flow data for 189 wastewater treatment plants under various flow scenarios:
 - Several timeframes: 5 years, 3 years, 1 year...
 - Several flows: max 3 month or 12 month rolling averages, average 3 month or 12 month rolling, etc.)
- Compliance data in relation to % of permitted flow
 - Result: no strong positive correlation between % and noncompliance for several parameters (BOD, CBOD, TSS)
- Number of TWAs issued in past year as a potential indicator of growth

Program Analysis Results

- Two programs (TWA and WQMP) have different objectives
- Flow statistics and associated time periods should be considered in light of those objectives
- TWA : 100% permitted capacity vs. committed flow = existing flow (most recent 3 months) + approved
- Planning:
 - Build-out (20 year for urban areas) vs. permitted capacity
 - 80% of permitted capacity vs. highest 12 month rolling average over 5 years

Proposed Changes

- TWA: No change in the consistency assessment for issuance a Treatment Works Approval (w/in approved SSA).
- Title: Capacity Assurance revised to Capacity Analysis Program
- Increasing requirement of committed flow of POTW from **80 to 100%** of permitted capacity.
- Certification(s) will be required by the **permittee** that the program submitted will implemented
- Department review and approval of the CAP program is not required.
- Department shall monitor CAP program for compliance.

Capacity Analysis Program

New sub-section...to allow 'exit' if:

- Committed flow has NOT, over a period of 3 years, reached 100% of the permitted capacity of the treatment works; and
- the facility has implemented measures to reduce flow (as identified in the 'program'); and
- the facility had no serious violations (as defined at N.J.A.C. 7:14A-1.2) over that period, then
- the facility **may request authorization by the Department to be reduce monthly reporting**

Results

- Planning rule looks at build out vs. permitted capacity and 80% of permitted capacity vs. highest 12 months average over 5 year period.
- TWA/Infrastructure rule looks at most recent 3 months; requires detailed analysis when flows reach 100% of permitted capacity
- Concurrent Rule Proposal: December 2014/January 2015

QUESTIONS?